

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Civil Action No.: 1:19-cv-00593-LCB-JLW

ZION WILLIAMSON,

Plaintiff,

v.

**PRIME SPORTS MARKETING, LLC
and GINA FORD,**

Defendants.

**PLAINTIFF’S MOTION FOR
SUMMARY JUDGMENT
(Fed. R. Civ. P. 56)**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Zion Williamson (“Williamson”) moves the Court for summary judgment on all counterclaims of Defendants Prime Sports Marketing, LLC and Gina Ford (collectively “Prime Sports”), as there are no genuine issues of material fact and Williamson is entitled to judgment as a matter of law on each of Prime Sports’ counterclaims. In support of this Motion, Williamson files his supporting brief; the declaration of Lloyd Frischer and accompanying exhibits; the declaration of Katherine D. Kohr and accompanying exhibits; the declaration of Scott Widelitz; the declaration of Brian Bayne; and the declaration of Jeffrey S. Klein, Esq. and accompanying exhibits.

WHEREFORE, Williamson respectfully requests that the Court enter summary judgment in his favor on each of Prime Sports’ counterclaims and award Williamson such other and further relief as the Court deems just and proper.

[Signatures Follow]

Dated: February 11, 2022

/s/ John R. Wester

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* Local Rule 83.1(d) Special Appearance

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